

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

**Allen Baxter, III** : **Case No. 19-16493-AMC**  
**Debtor(s)**

OBJECTION TO CERTIFICATE OF DEFAULT AND CERTIFICATE OF SERVICE

Debtor, by his counsel, object to the certificate of default and request the Court not enter a relief order and to please hold a hearing due to the following:

The Debtor's employer took out extra money due to a Wage Order and an Amended Wage Order which left the debtor short of funds. The debtor is able to get caught up with funds and it would be unfair to allow a relief order to be entered when the debtor is properly making payments and would have had the funds except for the employer's extra withholding.

/s/David M. Offen  
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A copy of this Objection is being served on Denise Carlon, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor